REMARKS/ARGUMENTS

The amended listing of claims and the following arguments are presented generally to impart precision to the claims, by particularly pointing out and distinctly claiming the subject matter. The pending claims are supported by the specification. No new matter is added.

Applicant respectfully submits that the currently pending claims are patentable over the cited references.

Election/Restrictions

Applicant respectfully affirms the election of group I, including claims 1-30, for prosecution in the present application, in response to the election/restrictions requirement presented in the Office Action mailed February 16, 2005.

35 U.S.C. §102(b) Rejections

The Office Action rejected claims 21-27 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,915,001 (hereinafter "Uppaluru"). Applicant respectfully submits that Uppaluru does not show each and every aspect of claims 21-27.

For example, claim 21 recites:

21.   (Original) A method for accessing an enterprise data system via a telephone, comprising:

enabling a user to establish a telephone connection to a voice access system;

authenticating the user with the voice access system using a login process in which the user is identified by a unique user identifier;

determining enterprise data system log-in data that enables the user to access the enterprise data system, based on the unique user identifier for the voice access system;

automatically logging the user into the enterprise data system using the enterprise data system log-in data;

providing a voice user interface that enables the user to navigate and query data from a plurality of domains using spoken navigation and natural language query commands, wherein each domain comprises data corresponding to a respective type of object in the enterprise data system; and

providing feedback data in a verbal format to the user via the telephone connection in response to spoken navigation and natural language query commands, said feedback data including data corresponding to data retrieved from the enterprise data system in response to the natural language query commands and system prompts in response to the spoken navigation commands.

For the rejection of claim 21, the Office Action relied upon the description of Uppaluru (Col. 3, lines 1-17), which shows:

"When a user calls into the distributed voice and speech processing system associated with the voice web, the system first identifies the user utilizing a unique account number (such as phone number or social security number). Next, it accesses the user's personal profile using the corresponding URL and retrieves the user attributes and preferences related to authentication and security. Using this personal profile information, the voice web system authenticates the identity of the user using a combination of personal identification code based password checking and voice imprint matching. The voice imprint is any sufficiently long utterance or phrase that the user has previously entered into his/her profile. Each user's voice imprint is analyzed

and stored in the profile for quick matching on demand with a real-time provided user sample. The combination of every individual's unique vocal characteristics stored in the voice imprint coupled with the random choice of the password phrase ensures a high degree of security and authentication." (Col. 3, lines 1-17, Uppaluru).

From this description, a person skilled in the art understands that the voice web system of Uppaluru "authenticates the identity of the user using a combination of personal identification code based password checking and voice imprint matching".

However, this description of Uppaluru is only above the authentication of a single voice web system. Since this description of Uppaluru does not involve two different systems that require separate authentication, it does not show both "authenticating the user with *the voice access system...*" and "automatically logging the user into *the enterprise data system...*". Note that in the system of Uppaluru, the "password" and "voice imprint" are for the same authentication process to access the same "voice web system". Thus, it is clear that Uppaluru does not show "determining enterprise data system log-in data that enables the user to access the enterprise data system, based on the unique user identifier for the voice access system".

Further, element 105 in Figure 1 of Uppaluru was relied upon in the Office Action for the limitation of "providing a voice user interface that enables the user to navigate and query data from a plurality of domains using spoken navigation and natural language query commands". However, application respectfully submits that element 105 in Figure 1 of Uppaluru provides no indication of spoken "natural language query" command(s). Similarly, Col. 19, lines 24-60, of Uppaluru does not show "said feedback data including data corresponding to data retrieved from the enterprise data system *in response to the natural language query commands ...*".

Thus, at least for the above reasons, Uppaluru does not anticipate claim 21 and its dependent claims. The withdrawal of the rejection under 35 U.S.C. §102(b) for claims 21-27 is respectfully requested.

35 U.S.C. §102(e) Rejections

The Office Action rejected claims 28-30 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,633,846 (hereinafter "Bennett"). Applicant respectfully submits that Bennett does not show each and every aspect of claims 28-29.

For example, claim 28 recites:

28.   (Original) A method for accessing an enterprise data system via telephone using a voice access system, comprising:

defining a set of grammars comprising a language and syntax in which data are stored as phonetic representations of the data;

retrieving selected data from the enterprise data system;

pre-compiling at least a portion of the selected data into predefined forms corresponding to the set of grammars;

storing the pre-compiled data in a local database that is apart from the enterprise data system;

enabling a user to request an ad hoc query be performed against data stored in the enterprise data system and/or local database using a spoken natural language query;

converting the spoken natural language query into a data request and retrieving data from the enterprise data system and/or local database corresponding to the ad hoc query; and

providing feedback data corresponding to data that are retrieved in a verbal format to the user via the telephone connection.

Applicant respectfully submits that Bennett does not show "an ad hoc query ... using a spoken natural language query."

Although Figure 1 of Bennett shows "speech input", a person skilled in the art understands that "speech input" is not sufficient to anticipate "an ad hoc query ... using a spoken natural language query."

Further, from the description of Bennett (e.g., Col. 24, line 56 – Col. 26, line 3; Figures 11A-11C; abstract), a person skilled in the art understands that in the system of Bennett the spoken user query is only used to select a pre-defined "potential" question. The spoken user query is processed by the Natural Language Engine (NLE) to extract Noun Phrases (NP). The NP is then used to select a set of potential questions as a result of a full-text search. One of the potential questions is then selected as the best match to the user query. The answer to the selected potential question is then provided as if it is the answer to the user query.

Thus, it is understood that the system of Bennett is not capable of providing answers to "an ad hoc query". The system of Bennett has only answers to pre-defined potential questions. The user of the system of Bennett can only select one of the potential questions using "speech input". Further, the system of Bennett does not perform the operation of "converting the spoken natural language query into a data request and retrieving data from the enterprise data system and/or local database corresponding to the ad hoc query". Note that in the system of Bennett, the answer to the predefined, potential question is provided in response to the user query, which may not even actually relate to the answer in a meaningful way.

Thus, at least for the above reasons, Bennett does not anticipate claim 28 and its dependent claims. The withdrawal of the rejection under 35 U.S.C. §102(e) for claims 28-30 is respectfully requested.

35 U.S.C. §103(a) Rejections

The Office Action rejected claims 1-11 and 15-20 under 35 U.S.C. §103(a) as being unpatentable over Bennett in view of Uppaluru. The Office Action rejected claims 12-14 under 35 U.S.C. §103(a) as being unpatentable over Bennett in view of Uppaluru and further in view of U.S. Patent No. 6,724,864 (hereinafter "Denneberg"). Applicant respectfully submits that these claims are patentable over the cited references, since the cited references do not show each and every aspect of the pending claims.

For example, claim 1 recites:

> 1. (Currently Amended) A method for accessing data from an enterprise data system via user voice input, comprising:
> authenticating the user using a login process in which the user is identified by a unique voice user identifier;
> transparently logging the user into the enterprise data system through use of information obtained during authentication of the user;
> enabling the user to request an ad hoc query be performed against data stored by the enterprise data system using a spoken natural language query;
> converting the spoken natural language query into a data query and executing the data query to retrieve any data in the enterprise data system corresponding to the ad hoc query;
> providing feedback data corresponding to data retrieved from the enterprise data system in a verbal format to the user.

The Office Action admitted that Bennett does not show "transparently logging the user into the enterprise data system through use of information obtained during authentication of the user" and relied upon the description of Uppaluru (Col. 3, lines 1-17) for this limitation. However, as discussed above in the context of claim 21, Uppaluru (Col. 3, lines 1-17) shows only the authentication process for the single voice web system. This description of

Uppaluru does not show *transparently* logging into another system after the authentication process for the voice web system and. Note that in the system of Uppaluru, the "password" and "voice imprint" are for the same authentication process to access the same "voice web system". Thus, Uppaluru does not show the limitation of *"transparently logging* the user *into the enterprise data system* through use of information obtained during authentication of the user".

Further, the Office Action relied upon Bennett for the limitations of "enabling the user to request an ad hoc query be performed against data stored by the enterprise data system using a spoken natural language query" and "converting the spoken natural language query into a data query and executing the data query to retrieve any data in the enterprise data system corresponding to the ad hoc query". However, as discussed above in the context of claim 28, Bennett does not show "an ad hoc query ... using a spoken natural language query."

Although Figure 1 of Bennett shows "speech input", a person skilled in the art understands that "speech input" is not sufficient to anticipate "an ad hoc query ... using a spoken natural language query."

Further, from the description of Bennett (e.g., Col. 24, line 56 – Col. 26, line 3; Figures 11A-11C; abstract), a person skilled in the art understands that, in the system of Bennett, the spoken user query is only used to select a pre-defined "potential" question. The spoken user query is processed by the Natural Language Engine (NLE) to extract Noun Phrases (NP). The NP is used to select a set of potential questions as a result of a full-text search. One of the potential questions is then selected as the best match to the user query. The answer to the selected potential question is then provided as if it is the answer to the user query.

Thus, it is understood that the system of Bennett is not capable of providing answers to "an ad hoc query". The system of Bennett has only answers to pre-defined potential questions. The user of the system of Bennett can only select one of the potential questions using "speech input". Further, the system of Bennett does not perform the operation of "converting the spoken natural language query into a data query and executing the data query to retrieve any data in the enterprise data system corresponding to the ad hoc query". Note that in the system of Bennett, the answer to the predefined, potential question is provided in response to the user query, which may not even actually relate to the answer in a meaningful way.

The rejection of claim 15 relied upon the similar citations of Bennett and Uppaluru for similar elements recited in claim 1. Thus, at least for the reasons discussed above, Bennett and Uppaluru do not show each and every aspect of claims 1 and 15 and their dependent claims.

Claims 12-14 are dependent claims of claim 1. The Office Action relied upon Denneberg for the additional limitations recited in claims 12-14. However, since Bennett and Uppaluru do not show each and every aspect of claim 1, Bennett, Uppaluru and Denneberg do not show each and every aspect of claims 12-14 even if Bennett, Uppaluru and Denneberg were combined in a way suggested in the Office Action.

Thus, the withdrawal of the rejections of claims 1-20 under 35 U.S.C. §103(a) is respectfully requested.

The remaining claims depend from at least one of the independent claims discussed above, and therefore include at least some of the distinguishing claim limitations as discussed above. As a result, the remaining claims are also patentable.
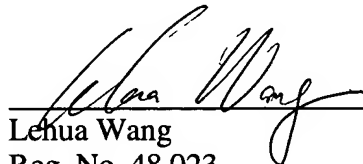
CONCLUSION

Applicant respectfully submits that the pending claims are patentable over the cited references. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call at (408) 720-8300.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due or credit any overages. Furthermore, if an extension is required, Applicant hereby requests such extension.

Respectfully submitted,

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